

UNITED STATES DISTRICT COURT
DISTRICT OF MAINE

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CLERK AND FILED
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UNITED STATES OF AMERICA)

v.)

Criminal No. 07-06 -P-S

FILED UNDER SEAL DEPUTY CLERK

JEREMY MERCIER)

JASON JORDAN)

DONALD GODIN)

EFSTATHIOS MIHALAKIS)

MICHAEL HOFFMAN)

JAMES NIEMI)

KIRK GROVER)

SCOTT BURNS)

ROYCE LAJOIE)

JUSTIN SMITH)

JOSHUA BLACK)

JAMES MICHAUD)

PAMELA BEAN)

ROMAINE LANGELIER)

MICHELLE FORTIER)

LINDA WILSON)

RYAN BOURGOIN)

MOTION FOR LIMITED UNSEALING OF REDACTED INDICTMENT

NOW COMES the United States of America and hereby moves for an order permitting the limited unsealing of the indictment in the above-captioned case for the reasons stated below.

1. On January 10, 2007, the Grand Jury returned a secret Indictment charging 17 defendants. The indictment has 40 counts and a forfeiture allegation. Not all defendants are charged in every count.

2. Due to the large number of defendants, all the defendants will not be arrested at the same time.

3. To minimize the risk of flight of the defendants who are not arrested initially, and to preserve the safety of the officers effectuating the later arrests, the Government moves the Court to

1/17/07
Granted.
David M. Cohen
JPM

allow the Government to unseal and produce redacted copies of the Indictment to each of the defendants. Each copy of the Indictment will be redacted so that only that particular defendant's name and the charges against that particular defendant will be disclosed to that defendant prior to the initial appearance. Utilizing this approach allows the individual defendants to be notified of the charges pending against him/her, while preserving the secrecy of the other charges against other defendants until every defendant is arrested.

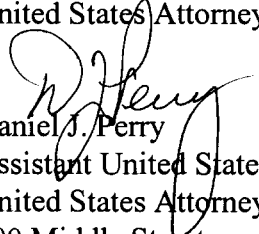
4. The Government believes all of the defendants will be arrested within days of each other and that the Government will seek to unseal the unredacted Indictment at that time.

Accordingly, the Government moves this Court to issue an order permitting the limited unsealing of the Indictment, redacted according to the process outlined in paragraph 3, above. The government further requests that this motion and any resulting docket entries be sealed pending further order of the court.

Respectfully submitted:

PAULA D. SILSBY
United States Attorney

Dated: January 17, 2007



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CERTIFICATE OF SERVICE

I hereby certify that the foregoing Motion for Limited Unsealing was hand filed with the Court on January 17, 2007.

Nancy Evans
Nancy Evans
Paralegal Specialist